

AMENDMENTS TO THE DRAWINGS

Please replace Figures 3, 5, 6, 9, 10, 10A, 11, 13, 14, 16, 18, and 20 with the drawing replacement sheets filed concurrently with this Amendment. The amendments to the drawings are discussed in the Remarks section of this paper. The amendments do not introduce any new matter.

REMARKS

Introductory Comments

In the Office Action, the Examiner: (1) objected to informalities indicated as being associated with various of the drawings; (2) objected to informalities indicated as being associated with aspects of the specification; (3) rejected claims 1, 2, 4, 7-16, 18, 21-32, 34, 37-48, 50, and 53-64 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,892,905 to Brandt et al. (hereinafter “Brandt”) in view of U.S. Patent No. 6,526,570 to Click, Jr. et al. (hereinafter “Click”); (4) rejected claims 3, 5, 17, 19, 33, 35, 49, and 51 under 35 U.S.C. §103(a) as being unpatentable over Brandt and Click in view of Smith, “Protocol Work Melds Storage Methods,” *Network World*, 13 September 1999, p. 67 (hereinafter “Smith”); (5) rejected claims 6, 20, 36, and 52 under U.S.C. §103(a) as being unpatentable over Brandt and Click in view of U.S. Patent No. 6,397,191 to Notani et al. (hereinafter “Notani”); (6) rejected claims 71 and 72 under 35 U.S.C. §103(a) as being unpatentable over Brandt and Click; and (7) rejected claims 65-70 under 35 U.S.C. §103(a) as being unpatentable over Brandt and Click in view of U.S. Patent No. 5,930,512 to Boden et al. (hereinafter “Boden”).

In this Amendment, Applicants have amended claims 15, 29, 47, 63, and 65 to better articulate novel aspects. No claims have been cancelled, and no new matter has been introduced. Amendments to the drawings and the specification have been made as described herein. Claims 1-72 remain pending in the application, with claims 1, 31, and 65 being in independent form.

Summary of Arguments

After carefully considering the rejections and the responses to arguments presented by the Examiner in the Office Action, Applicants continue to find patentable subject matter recited in the claims. With respect to independent claims 1 and 31, for example, Applicants continue to find that the Office Action fails to provide evidence sufficient to establish a *prima facie* case of obviousness because one of ordinary skill in the art would not have been motivated to combine Brandt and Click. In particular, none of the alleged motivations cited in the Office Action would have actually motivated one of ordinary skill in the art to combine the references. Moreover, even if Brandt and Click were combined as asserted by the Examiner, the references, taken alone or in combination, do not teach or suggest each and every limitation recited in claims 1 and 31. In particular, for example, there is no teaching in

the references of a platform independent object being configured to provide input data received from a client server in the context of the claims.

With respect to independent claim 65, Applicants have amended this claim to include the limitation of a predefined notification view control page being configured to be issued when a task is not completed by a designated deadline. For at least the reasons discussed below, Brandt, Click, and Boden, taken alone or in combination, do not teach or suggest this claim limitation.

Even if the Examiner disagrees with the arguments presented for the patentability of independent claims 1, 31, and 65, Applicants have presented strong arguments herein for the patentability various of the dependent claims. As a first example, claims 71 and 72 recite a filter page that, contrary to the assertions of the Examiner, is not taught in the art in the context of the claims. As a second example, claims 3, 17, 33, and 49 recite record locking a task to permit exclusive access by checking out the task to a user for the user to work on the task. The soft lock mechanism of Smith does not provide exclusive access or check out a task to a user. By way of yet a third example, claims 15, 29, 47, and 63 recite at least one control page comprising a worklist page, a process instance page, a process template page, a work item control page, a filter control page, and a notifications page. The prior art of record does not teach or suggest each and every one of these claimed elements.

Objections to the Drawings

In the Office Action, the Examiner did not withdraw several of the objections to the drawings made in the final Office Action (dated October 19, 2004) because the drawings submitted with the Amendment filed February 22, 2005 were the same as the original drawings (pages 2 and 3 of the Office Action), rather than the intended replacement drawing sheets. Applicants apologize for this oversight. Appropriate replacement sheets are being filed concurrently with this Amendment to overcome the objections to the drawings presented in the Office Action.

In the replacement drawing sheets, Fig. 5 has been amended so that “Worklist View – User BEN” is now labeled “59” rather than “58” in order to conform to 37 CFR 1.84(p)(4). The specification was previously amended to reflect the use of “59” to indicate “Worklist View – User BEN” as shown in the replacement sheet for Fig. 5. Reference “72,” which previously indicated the “User” link, has been removed from Fig. 5 to conform to 37 CFR 1.84(p)(5).

Fig. 16 has been amended to include “192” as a label for the “columns” in order to bring the drawings into conformity with 37 CFR 1.83(a).

In Fig. 3, per the request of the Examiner, “Process Instance Creation UI” has been amended to “Process Instance Activity UI”; “42-9, -10, -11, -12” has been amended to “42-9, -10, -11, -12, -13”; and a line connecting the Template View 42-8 and the Process Instances 42-6 has been added. The positioning of several elements of Figure 3 has been slightly rearranged in order to accommodate the new connection line without having to intersect other connecting lines.

In Fig. 15, reference “44” has been amended to “44-15.” The specification has also been amended herein, as described above, to conform to this change so that the “Process Instance Activity User Interface” is designated as “44,” and the “Activity User Interface” is designated as “44-15” in both the drawings and the specification.

In Fig. 18, the reference number “226” pointing to the step identified as “Forward this request to URL of Activity UI page” has been changed to reference number “227.” The specification has also been amended herein, as described above, to conform to this change.

In Fig. 20, “Process Instance Creation UI” has been amended to “Process Instance Activity UI” at steps 260 and 262, as well as at the textual description for reference number “44.”

Figures 3, 5, 6, 9, 10, 10A, 11, 13, 14, and 16 have been amended to better show details identified in select shapes that the Examiner may have been referring to as having unclear content. For example, the worklist view 42-5 of Figure 3 has been amended to better show that it reads “Worklist View.” The details within other shapes have been similarly clarified.

The proposed amendments to the drawings are fully supported in the specification as filed. Based on the amendments to the drawings reflected in the replacement drawing sheets, it is respectfully suggested that Applicants have overcome the objections to the drawings.

Objections to the Specification

In the Office Action, the Examiner objected to the specification because of various informalities (page 6 of the Office Action). Applicants have amended the relevant paragraphs of the specification as indicated above to correct the informalities identified in the Office Action. In particular, “form” has been changed to “from” on page 8, line 31, the word “activity” has been added at page 43, line 33, and a clarification related to the results control page 42-13 has been added to the paragraph at page 27, lines 14-21. Reference number

“227” has been added at page 36, line 10 to coincide with amendments to the drawings made herein. The amendments to the specification have been made by way of the replacement paragraphs listed above. In light of these amendments to the specification, it is respectfully suggested that Applicants have overcome the objections to the specification.

Rejection of claims 1-72 under 35 U.S.C. §103(a)

Although the Examiner attempts to describe additional support mostly in the same prior art references used previously for the rejections of claims 1-72, for at least the reasons discussed below, the Office Action still fails to establish a *prima facie* case of obviousness against the claims. A *prima facie* case of obviousness requires: (1) a suggestion or motivation to modify or combine the reference teachings; (2) a reasonable expectation of success; and (3) a teaching or suggestion in the prior art references of all of the claim limitations (MPEP 2143). The Office Action does not satisfy all of these requirements.

A. Independent Claims 1 and 31

Independent claims 1 and 31 continue to be rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt in view of Click (pages 13-16 and 19 of the Office Action). However, the Office Action fails to establish a *prima facie* case of obviousness against these independent claims for at least two separate reasons: (1) one of ordinary skill in the art would not have been motivated to combine Brandt and Click as asserted by the Examiner; and (2) Brandt and Click, taken alone or in combination, do not teach or suggest every claim limitation recited in claims 1 and 31.

1. One of ordinary skill in the art would not have been motivated to combine Brandt and Click

The Office Action fails to establish a *prima facie* case of obviousness against independent claims 1 and 31 because one of ordinary skill in the art would not have been motivated to combine Click and Brandt as asserted by the Examiner. In particular, the references do not contain any suggestion or motivation that could reasonably provide sufficient evidence to support the asserted combination. On page 8 of the Office Action, the Examiner responds to Applicants’ previous arguments against combination (presented in the response filed February 22, 2005) by pointing out that both Brandt and Click “refer to an interface and to transferring data over coupled computer networks, such as the Internet.” However, the disclosures of interfaces and of transferring data as contained in Brandt and Click are taught in completely divergent contexts that would not motivate combination of the references. Brandt teaches a common user interface allowing software applications to be

accessed via the World-Wide Web (Title of Brandt). The common user interface of Brandt provides capability for transferring data over the World-Wide Web in a common, standardized HTML format (Abstract of Brandt). In direct contrast, Click teaches transferring platform-specific data, rather than data in a standard, common format. In particular, column 6, lines 57-63 of Click, as cited by the Examiner, teach that an “arrangement is particularly well suited for applications involving transferring data over coupled computer networks, such as the Internet, local area networks (LANs), and the like.” However, the Examiner, respectfully, fails to consider that the context of this teaching involves an arrangement in which platform-specific data is transferred over a computer network to a compiler (208). Specifically, Click teaches a file stack (301) stored in a remote location. The data stored in the file stack (301) is transferred over a computer network to a compiler unit (208). However, the data stored in the file stack (301) comprises platform-dependent architecture design (AD) files (col. 6, lines 51-63 of Click). The transfer of platform-specific data over a computer network, as taught in Click, and the transfer of non-platform specific HTML data over a common user interface, as taught in Brandt, are distinct and would not have motivated one of ordinary skill in the art to combine the references as asserted by the Examiner. Moreover, the interface 214 of Click relied upon by the Examiner on pages 8 and 9 of the Office Action is also directed to transferring platform-dependent object code to a compiler (208) and therefore similarly fails to provide any motivation to combine the references.

The lack of a motivation or suggestion for combination of Brand and Click is also readily apparent from the divergent problems sought to be solved by the references. Brandt is directed to providing a common user-interface that allows end users to access software applications via the World Wide Web (Abstract of Brandt). Accordingly, end users do not need to install a platform-specific software application on their client computers. In contrast, Click is directed to compiling platform-specific software applications that can be ported between different computer systems (col. 1, lines 35-38 and col. 3, lines 9-17 of Click). Thus, Click solves the software portability problem by creating (i.e., compiling) software applications in platform-specific code that can be installed and run on a platform-specific computer. While Brandt seeks to provide a common access point to a software application, thereby allowing users to access a software application without installing and running the software application on local client computers, Click contrastingly teaches compiling software applications for different computer architectures so that the software application can be distributed and run (“ported”) on different computer architectures (col. 1, lines 35-38 and

col. 3, lines 9-17 of Click). Thus, the directions of Brandt and Click are divergent, and, without impermissible hindsight, one skilled in the art would not have been motivated to combine the divergent references as suggested by the Examiner.

In addition, even if Brandt and Click “are combinable” as asserted by the Examiner on page 9 of the Office Action, “[t]he mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. *In re Mills*, 916 F.2d 680, 16 USPQ2d 1420 (Fed. Cir. 1990).” M.P.E.P. § 2143.01. Thus, the Examiner’s reliance upon very general computing terms such as “interface” and “transferring data over coupled computer networks” impermissibly looks to an unaccepted standard of whether references can be combined, not whether the references contain a motivation or a suggestion that would have motivated one of ordinary skill in the art to combine their teachings. If any general computing term or phrase could be relied upon to support a combination of references, virtually any computer-related publications could then be combined. Such a standard is far too broad and does not meet the accepted standard that a reference must contain a motivation or a suggestion that would move one of ordinary skill in the art to combine the references.

Moreover, the Examiner’s reliance upon very general goals such as increased productivity, greater efficiency, and quality decision making cannot reasonably support the combination of Brandt and Click asserted by the Examiner. Applicants cannot ascertain from the Office Action how such broad goals would have somehow motivated one of ordinary skill in the art to combine the Click and Brandt references, which are directed to divergent solutions to different problems. For example, neither Click nor Brandt includes any mention of decision-making. Click is directed to building compilers for different computer architectures, and Brandt is directed to providing a common interface for communicating with a software application via the World Wide Web (WWW), neither of which has anything to do with decision-making.

For any of the foregoing reasons, one of ordinary skill in the art would not have been motivated to combine Brandt and Click. Consequently, the Office Action fails to provide evidence sufficient to establish a *prima facie* case of obviousness against independent claims 1 and 31.

2. Brandt and Click do not teach every claim limitation of claims 1 and 31

Claims 1 and 31 are patentable for another, independent reason: even if the asserted combination is assumed to be permissible for the sake of argument, the combined references

still fail to teach or suggest each and every claim limitation recited in independent claims 1 and 31. The Examiner admits on page 14 of the Office Action that Brandt does not teach the following claim limitations recited in claim 31:

interfacing at least one second workflow platform independent object with the at least one first workflow platform dependent object, wherein the at least one second workflow platform independent object is configured to provide input data received from the client server to the at least one first workflow platform dependent object and to receive output data provided by the workflow management system from the at least one first workflow platform dependent object.... (Emphasis added.)

Claim 1 recites similar limitations. The Examiner then asserts that Click cures the admitted deficiencies of Brandt. However, the combination of Brandt and Click does not teach or suggest every element of the above-highlighted limitations of claim 31. For example, on page 15 of the Office Action, the Examiner relies upon the platform-dependent compiler object code and the platform-independent compiler object code taught in Click as disclosing the claimed first workflow platform dependent object and second workflow platform independent object, respectively. The Examiner further relies upon an interface partially embedded in the compiler object codes that mediates the flow of information between the compiler object codes (page 15 of the Office Action). The Examiner specifically points to column 6, lines 16-22 of Click, which section states that “[d]uring run time (execution), the platform independent compiler object code, interacts with the platform dependent compiler object code to operate (i.e., compile) in a target dependent manner” (pages 8 and 15 of the Office Action).

However, the combination of the platform-dependent compiler object code, platform-independent compiler object code, and interface of Click with the common user interface of Brandt fails to teach or suggest the claim limitation of a second workflow platform independent object being configured to provide input data received from a client server to at least one first workflow platform dependent object. As taught in Click, the only user-defined or selected input to the compiler object codes is in the form of compiled platform-specific architecture design (AD) files (204) and platform-specific source code. An AD file (204) is used to generate the platform dependent compiler object code (206) (col. 5, lines 13-19), and the platform-specific source code is compiled in a target dependent manner to generate platform-specific object code (Figures 1 and 2 and col. 6, lines 16-22 of Click). Click specifically teaches that the platform independent compiler object code (210) is “already provide[d]” (Abstract of Click). Thus, the platform independent compiler object code (210)

is predefined and there is no teaching or suggestion in Click of the platform independent compiler object code (210) being configured to provide input data received from a client server, as recited in independent claim 31. Moreover, the platform-independent compiler object code (210) of Click is incapable of processing user requests received by the common user interface of Brandt because compiler object code is configured to process source code and is not capable of processing binary code, the form in which HTML user requests are received by the common user interface of Brandt. For the foregoing reasons, Brandt and Click, taken alone or together, fail to teach or suggest the claim limitation of a second workflow platform independent object being configured to provide input data received from a client server.

For any one of the foregoing reasons, the Office Action fails to establish a *prima facie* case of obviousness against independent claims 1 and 31, and Applicants respectfully request that the Examiner withdraw the rejections of these claims, which are in condition for allowance. Claims 2-30, 32-64, 71, and 72 are also in condition for allowance as dependents of either claim 1 or claim 31.

B. Independent Claim 65

Independent claim 65 was rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt and Click in view of Boden (pages 24-28 of the Office Action). Inasmuch as the Examiner relies upon both Brandt and Click to reject independent claim 65, the Office Action fails to establish a *prima facie* case of obviousness against claim 65 because, as discussed above in relation to independent claims 1 and 31, one of ordinary skill in the art would not have been motivated to combine Brandt and Click. Nevertheless, Applicants have amended independent claim 65 to further articulate novel aspects. In particular, independent claim 65 as amended recites the claim limitations of:

...creating at least one predefined notifications view control page within the created process directory in a predetermined protocol relating to a task assignable within the process and named for the task unique identifier if the task requires completion by a designated deadline, the at least one predefined notification view control page being configured to be issued when the task is not completed by the designated deadline;

locating the at least one predefined notifications view control page in the created directory within the predefined interface root directory path....

(Emphasis added.)

These limitations are fully supported in the Applicants' original specification (e.g., see page 28, lines 20-25 of Applicants' specification).

The prior art of record, taken either alone or in combination, does not teach or suggest the claim limitation of a predefined notification view control page being configured to be issued when a task is not completed by a designated deadline. The reception of user inputs through a World-Wide Web interface, as taught in Brandt, does not contain any teaching of this claim limitation, especially in the context of an online car rental application. In particular, the car reservation confirmation page taught in Brandt is presented upon rental of a car, not upon failure to complete a task by a designated deadline (col. 28, lines 9-56 of Brandt). There is no teaching in Brandt of a notification page being issued when a task is not completed by a designated deadline, and the remaining prior art of record does not cure this deficiency of Brandt. Therefore, Applicants respectfully request that the Examiner withdraw the rejection of independent claim 65, as well as the rejections of the claims depending from claim 65 (claims 66-70).

C. Separate Patentability of Dependent Claims

In view of the patentability of independent claims 1, 31, and 65, it is respectfully submitted that claims 2-30, 32-64, and 66-72 are in condition for allowance as dependents of the three independent claims. Nevertheless, the dependent claims recite claim limitations that are independently patentable over the prior art of record. A discussion of representative examples of such patentable claim limitations follows.

1. Claims 71 and 72

Claims 71 and 72 were rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt and Click (page 23 of the Office Action). Claims 71 and 72 recite claim limitations directed to a filter page for receiving filter parameters and invoking at least one ore the first and second objects to filter a work list with the workflow management system. In rejecting dependent claims 71 and 72, the Examiner admits that Brandt and Click do not teach a user interface filter page for receiving filter parameters via the user interface filter page (page 23 of the Office Action). Boden does not cure this deficiency.

Because of the lack of any teaching of filter functionality in the prior art, the Examiner relies upon Official Notice to allege that “it is old and well known in the workflow management system art to have the capability to request information the [sic] meets a certain criteria” (page 23 of the Office Action). The Examiner then proceeds to describe two examples totally unrelated to the workflow management system art, namely an online telephone directory and an ability to request transaction histories such as accounts receivable for a select period of time (page 23 of the Office Action). The examples in the Office Action fall outside the scope of the workflow management system art, especially when the

limitations of claims 71 and 72, as well as their respective base claims, are considered in their entire contexts. Applicants respectfully submit that the claim limitation of a filter page for receiving filter parameters and invoking at least one of the first and second objects to filter a work list with the workflow management system is not well known in the art. Applicants' specification specifically recognizes the lack of such capability in the prior art: "Users have easy access to underlying workflow functionality, such as convenient sorting and filtering of workflow items, previously unavailable in web-based interfaces for a WFMS 10" (page 40, lines 24-26 of Applicants' specification). Therefore, Applicants respectfully submit that the Examiner has failed to provide evidence sufficient to establish a *prima facie* case of obviousness against claims 71 and 72, and it is requested that the rejections of these claims be withdrawn.

If the Examiner continues to rely upon Official Notice to reject claim limitations directed to filter pages providing access to WFMS filter functionality, Applicants respectfully request pursuant to MPEP 2144.03 that the Examiner provide a duly executed affidavit or other documentary evidence to support the taking of Official Notice.

2. Claims 4, 18, 34, and 50

Claims 4, 18, 34, and 50 were rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt in view of Click (pages 9, 16, and 19 of the Office Action). With respect to claim 34, the Examiner relies upon Brandt's teaching of a software application generating values for variables to reject the claim limitation of causing a predefined protocol page to be presented to a user for performing work on a task (pages 9 and 16 of the Office Action). Applicants respectfully submit that Brandt does not teach this claim limitation because the generation of requested variables taught by Brandt is performed by software applications, which is entirely different from presenting a predefined protocol page to a user for performing work on the task because a software application can generate variables without presenting a page to a user for performing work on a task. Moreover, the section of Brandt relied upon by the Examiner to reject claim 34 is limited to HTML templates including variables, and values for the variables being requested from a software application. The software application can generate values for the variables. However, this does not in any way teach presenting a page to a user for the user to perform work on a task because there is no teaching of a page being presented to a user for the user to perform work on a task.

In addition, Brandt's teachings related to requesting input from a user do not teach or suggest the claim limitation of a user performing work on a task. As shown in Figure 7 of the present Application, work items include much more than merely providing input to HTML

forms. For example, Figure 7 shows work items to be performed by a user. The work items include tasks such as assessing a patient, admitting a patient, and checking out a patient, each of which requires more than simple data entry in a form. Therefore, the mere entry of a variable into an HTML page does not amount to a teaching or a suggestion of the claim limitation of presenting a page to a user for the user to perform work on a task.

Claims 4, 18, and 50 recite similar limitations of navigating the user to the predefined protocol page for performing work on the task. Because the prior art of record does not teach every claim limitation recited in dependent claims 4, 18, 34, and 50, the Office Action fails to establish a *prima facie* case of obviousness against these claims. Therefore, Applicants respectfully request that the Examiner withdraw the rejections of claims 4, 18, 34, 50, and their dependent claims (claims 5-16 and 35-48), which are in condition for allowance independently of their allowability based on their dependence from independent claims 1 or 31.

3. Claims 15, 29, 47, and 63

Claims 15, 29, 47, and 63 were rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt in view of Click (page 19 of the Office Action). With respect to claim 47, on page 19 of the Office Action the Examiner interprets a reservation confirmation template of Brandt to read on the notifications page recited in the claim. On page 11 of the Office Action, the Examiner explains that he interpreted claim 47 as being worded to allow its rejection upon a demonstration of existing art for any one of the pages recited in the claimed group. Applicants respectfully disagree with the Examiner's interpretation of claim 47. Nevertheless, Applicants have amended claims 15, 29, 47, and 63 to more clearly articulate novel aspects. As amended, claim 47 recites:

47. The method of claim 45 wherein the at least one control page comprises a worklist page, a process instance page, a process template page, a work item control page, a filter control page, and a notifications page.

Claims 15, 29, and 63 have been similarly amended. Accordingly, the teaching of just one of the pages recited in claim 15, 29, 47, or 63 cannot reasonably be relied upon to reject the entire claim. Therefore, Applicants respectfully request that the Examiner withdraw the rejections of claims 15, 29, 47, and 63, which are in condition for allowance independently of their patentability based on any intervening and/or base claims.

4. Claims 3, 17, 33, and 49

Claims 3, 17, 33, and 49 were rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt and Click in view of Smith (pages 11, 12, and 19-21 of the Office Action). With

respect to claim 33, the Examiner admits on pages 19 and 20 of the Office Action that Brandt and Click fail to teach the claim limitation of “invoking at least one of the first and second objects to record lock a task in the workflow management system corresponding to the work item identification and permit exclusive access by a user to the task identified by the work item identification by checking out the task to the user for the user to work on the task.” The Examiner then relies upon Smith to reject this claim limitation. In response to Applicants’ arguments presented in the previous amendment filed February 22, 2005, the Examiner continues to rely upon Smith’s teaching of using a CIFS soft lock mechanism to deal with instances in which more than one user wants access to the same data simultaneously (page 12 of the Office Action). However, the Examiner’s continued reliance on Smith overlooks the fact that Smith is directed to data storage, and more specifically to write operations for storing or modifying data. The soft lock mechanism of Smith manages file coherency so that multiple users can access stored data, and only one user at a time can overwrite the stored data (paragraph 9 of Smith). There is no teaching that such a soft lock mechanism permits exclusive non-writing access to a task by checking out the task to the user for the user to work on the task. The Examiner’s interpretation of Smith improperly attempts to expand Smith beyond the disclosed data storage domain and into a workflow management system, even though Smith does not contain any teaching of a workflow management system. For at least these reasons, Smith fails to teach record locking a task to permit exclusive access by checking out a task to a user.

Moreover, even if the Examiner’s interpretation of Smith is assumed to be accurate for sake of argument, incorporation of the record lock feature of Smith into the system of Brandt would compromise the purposes of Brandt. In particular, only one user would be able to access data returned by the accessed software application. In the context of the car rental application taught in Brandt, for example, the incorporation of a soft lock mechanism that permitted only exclusive access to a particular user would preclude more than one person from accessing car rental information simultaneously, which undesirable result teaches away from the combination of Smith with Brandt. In any event, regardless of the interpretation of the soft lock mechanism taught in Smith, the teaching does not disclose, teach, or suggest the claim limitation of record locking a task to permit exclusive access by checking out the task to a user to work on the task. Because the cited prior art of record does not teach or suggest every limitation of claim 33, the Office Action fails to establish a *prima facie* case of obviousness against claim 33 (MPEP 2143). Claims 3, 17, and 49 recite similar claim limitations. Therefore, Applicants respectfully request that the Examiner withdraw the

rejections of claims 3, 17, 33, and 49, which are in condition for allowance independently of their allowability based on their dependence from independent claims 1 or 31. Claims 4-16, 18, 34-38, and 50 are also in condition for allowance as dependents of claims 3, 17, 33, and 49, respectively.

CONCLUSION

All objections and rejections have been addressed. In view of the above, each of the presently pending claims in this application is believed to be in condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue. It is believed that any fees associated with the filing of this paper are identified in an accompanying transmittal. However, if any additional fees are required, they may be charged to Deposit Account 07-2347. To the extent necessary a petition for extension of time under 37 C.F.R. § 1.136(a) is hereby made, the fee for which should be charged to the aforementioned deposit account.

Respectfully submitted,

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